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7 Attorney for Plaintiff, Christian Leigh  
8 Gates

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 IN RE: BARD IVC FILTERS  
13 PRODUCTS LIABILITY LITIGATION  
14

Case No: 2:15-MD-02641-DGC

15 This Document Related to Plaintiffs:  
16 CHRISTIAN LEIGH GATES  
17

Civil Case No: 2:16-cv-02220-DGC

18 **UNOPPOSED MOTION FOR**  
19 **LEAVE TO AMEND COMPLAINT**

20 **UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT**  
21

22 Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure,  
23 moves this Court for an order amending the Complaint.

24 1. Plaintiff seeks leave to file the attached Second Amended Master Short Form  
25 Complaint for Damages for Individual Claims and Demand for Jury Trial to correct  
26 Paragraph 10 to read “x G2® Vena Cava Filter” instead of “X Eclipse® Vena Cava  
27  
28

1 Filter” (see Second Amended Master Short Form Complaint for Damages for Individual  
2 Claims and Demand for Jury Trial).

3 2. Plaintiff’s counsel has conferred with Defendants’ counsel and Defendants do  
4 not oppose the filing of this motion.  
5

6 3. Based on the foregoing, Christian Leigh Gates requests that this Court grant  
7 this request to correct Paragraph 10 to read “X G2® Vena Cava Filter,” and for leave to  
8 file the Second Amended Master Short Form Complaint for Damages for Individual  
9 Claims and Demand for Jury Trial, and direct the Clerk to file the attached Second  
10 Amended Master Short Form Complaint for Damages for Individual Claims and Demand  
11 for Jury Trial.  
12

13 Dated: October 5th, 2017

/s/ Joseph R. Johnson

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**Attorneys for Plaintiff**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of October, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson\_\_\_\_\_